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February 14, 2003

Mr. Steven M. Scharf, P.E., Project Manager New York State Department of Environmental Conservation Bureau of Eastern Remedial Action 50 Wolf Road Albany, New York 12233-7010

Re: Grumman Aerospace – Bethpage (NY Site 1-30-003A) & Naval Weapons Industrial Reserve Plant – Bethpage (NY Site 1-30-003B) Site Record of Decision as issued by the Navy

Dear Mr. Scharf:

We are in receipt of your request for an expeditious review and response regarding the Record of Decision (ROD) issued by the Navy. We have reviewed the ROD on behalf of the South Farmingdale Water District (SFWD) and the New York Water Service (NYWS) and have the following comments:

Pages DS-3 and 3 - We believe that the data in the vicinity of Well 75D2 already demonstrates the need for extraction and treatment and request that the Navy implement a remedy to minimize any further migration of this concentrated VOC plume to the south. Consideration should be given to pumping the extracted water back to the Grumman-Navy site where additional treatment facilities could be constructed adjacent to the on-site treatment system (ONCT).

Pages DS-3 and 3 - We are reiterating our comments that we previously provided on the proposed groundwater remedial program at GM-38. The proposed program should include a collection of extraction wells that optimizes the effectiveness of the remedial action in removing contaminants in the GM-38 area and reduces the potential impact of the contaminant plume on downgradient water supply wells. While the modeling results presented at the June 26, 2002 and October 22, 2002 TAC meetings suggested little difference to the downgradient wells regardless of whether two or three extraction wells were installed, it is our opinion that this conclusion is biased due to the proposed location and minimal pumping rate of the third extraction well and the slow rate of groundwater travel in the deeper Magothy aquifer. It is our opinion that if extraction well(s) at more significant pumping rates (1000 gpm +) were installed further south (on Hempstead Tumpike, in the vicinity of Mid-Island Hospital) coupled with looking at a longer period of time (in excess of 30 years), the benefit of adding additional extraction well(s) The proposed GM-38 area is would be more significant to downgradient water suppliers. upgradient of SFWD's largest well field (plant 1) where the SFWD has three of its eleven wells. Consequently, we are recommending that additional extraction wells with adequate pumping capacity (1000 gpm +) be added in the vicinity of Mid-Island Hospital to minimize the size and Mr. Steven M. Scharf, P.E., NYSDEC February 14, 2003 Page 2

concentration of the contaminant plume traveling south of Hempstead Turnpike beyond the proposed capture zone for GM-38.

Pages DS-4 and 19 – As part of the Public Water Supply Well Contingency Plan, consideration should be given to modifying the wording such that if either the outpost monitoring well data OR the ongoing modeling indicates that a water supply well will be impacted within five years or less, that the Navy will commence negotiations with the affected water supplier. This will minimize the possibility of contamination bypassing the outpost monitoring well and subsequently impacting the water supply well thereby putting the water supplier at risk with insufficient time to design and construct treatment facilities or implement an alternative measure.

Page 19 - Section G - second paragraph and 34 - Article 7 - last line

In addition to the Navy, NYSDEC and the Health Department, the affected Water Districts must also be a participant in any discussion relative of the evaluation of outpost monitoring well data and the need to implement an appropriate remedy.

Figures 3 and 5 – Please correct the location of the wells at Plant site 1. Wells N-4043, N-5148 and N-7377 are on the same Plant site (1) and well N-4042 no longer exists.

Figure 3 – Based on the latest data, this figure does not appear to accurately and clearly show the extent of VOC contaminated groundwater (>MCLs).

In closing, we thank you for the opportunity to comment on the ROD and look forward to the department supporting the concerns of the SFWD and NYWS. Due to the tight time constraints in responding to the ROD, the water suppliers may decide to forward additional comments under separate cover.

Very truly yours,

HOLZMACHER, McLENDON & MURRELL, P.C.

Gary E. Loesch, P.E.

SFWD Board of Commissioners
Vincent A. Bohn, Jr., Vice President, NYWS
Superintendent William Bier, SFWD

Matthew Snyder, NYWS
Joseph Trotta, NYWS